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Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

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HECTOR BETANCOURT,

Plaintiff,

**NOTICE OF  
ADOPTION**

-against-

**07 CV 4453**

ALAN KASMAN DBA KASCO, AMERICAN EXPRESS BANK, LTD, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., BANKERS TRUST COMPANY, BATTERY PARK CITY AUTHORITY, BFP ONE LIBERTY PLAZA CO., LLC, BFP TOWER C CO. LLC., BFP TOWER C MM LLC., BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., BT PRIVATE CLIENTS CORP., DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION, ENVIROTECH CLEAN AIR, INC., GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HILLMAN ENVIRONMENTAL GROUP, LLC, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., LEHMAN BROTHERS HOLDINGS INC., LEHMAN BROTHERS, INC., LEHMAN COMMERCIAL PAPER, INC.,

MCCLIER CORPORATION, MERRILL LYNCH & CO,  
INC., NATIONAL ASSOCIATION OF SECURITIES  
DEALERS, INC., NEW LIBERTY PLAZA LP, NEW  
YORK CITY ECONOMIC DEVELOPMENT  
CORPORATION, NEW YORK CITY INDUSTRIAL  
DEVELOPMENT AGENCY, NEW YORK CITY  
INDUSTRIAL DEVELOPMENT CORPORATION, ONE  
LIBERTY PLAZA, STRUCTURE TONE (UK), INC.,  
STRUCTURE TONE GLOBAL SERVICES, INC., THE  
BANK OF NEW YORK TRUST COMPANY NA, THE  
BOARD OF MANAGERS OF THE ONE LIBERTY  
PLAZA CONDOMINIUM (CONDO #1178), THE ONE  
LIBERTY PLAZA CONDOMINIUM (CONDO #1178),  
TISHMAN INTERIORS CORPORATION, TRAMMELL  
CROW COMPANY, TRAMMELL CROW CORPORATE  
SERVICES, INC., WESTON SOLUTIONS, INC., WFP  
ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY  
PLAZA, CO. GP, CORP., WFP RETAIL CO. G.P. CORP.,  
WFP RETAIL CO. L.P., WFP TOWER D CO. G.P.  
CORP., WFP TOWER D HOLDING CO. I L.P., WFP  
TOWER D HOLDING CO. II L.P., WFP TOWER D  
HOLDING I G.P. CORP., WFP TOWER D. CO., L.P.,  
AND WORLD FINANCIAL PROPERTIES, L.P., ET AL,

Defendants.

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PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a  
STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES,  
INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations  
set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master  
Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's  
Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In*  
*Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does  
not comprehensively address any of the specific allegations within the Check-Off

Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
September 8, 2007



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